

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

EPSILON ENERGY USA,  
INC.,

Plaintiff,

v.

CHESAPEAKE APPALACHIA, LLC,

Defendant.

Civil Action No.

Judge

**FILED**  
HARRISBURG, PA

APR - 9 2021

PER DISC  
DEPUTY CLERK

**MOTION FOR LEAVE TO SERVE LIMITED EXPEDITED DISCOVERY**

Plaintiff Epsilon Energy USA, Inc. (“Epsilon”), by and through its undersigned counsel, respectfully moves this Court for leave to conduct limited expedited discovery to support its claims for a preliminary injunction as forwarded in Epsilon’s Memorandum in Support of Motion for Preliminary Injunction (“Injunction Motion”). In support of this motion, Epsilon refers the Court to its Memorandum in Support, filed contemporaneously herewith.

WHEREFORE, for the reasons stated in the accompanying Memorandum in Support of Motion for Leave to Conduct Limited Expedited Discovery, Epsilon respectfully requests this Court enter an Order granting it leave to serve the Requests for Production attached to its Memorandum in Support as Exhibit A and that Defendant Chesapeake Appalachia, LLC be ordered to provide responsive documents within seven (7) days of service.

Dated: April 9, 2021

Respectfully submitted,

/s/ Gregory J. Krock

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*Counsel for Plaintiff Epsilon Energy USA,  
Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing **Motion for Leave to Serve Limited Expedited Discovery** has been served upon the following by mail, this 9th day of April 2021:

Chesapeake Appalachia, LLC  
c/o The Corporation Company  
1833 S. Morgan Road  
Oklahoma City, OK 73128

/s/ Gregory J. Krock  
Gregory J. Krock